

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CLEAR CHANNEL OUTDOOR, INC., )  
Boston Division )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
INTERNATIONAL UNION OF )  
PAINTERS AND ALLIED TRADES, )  
AFL-CIO, CLC, DISTRICT COUNCIL #35 )  
 )  
Defendant. )

Civil Action No.: 05-CV-10380-WGY

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U.S. DISTRICT COURT  
DISTRICT OF MASS

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**MOTION FOR LEAVE TO ADMIT**  
**L. MICHAEL ZINSER AND GLENN E. PLOSA PRO HAC VICE**

In accordance with Rule 83.5.3(b), George A. Berman, a member of the bar of Massachusetts, respectfully moves for the admission *pro hac vice* of L. Michael Zinser and Glenn E. Plosa of the Zinser Law Firm, P.C., 150 Second Avenue North, Suite, 410, Nashville, Tennessee 37201, (615) 244-9700 to appear and practice in this Court for this case as co-counsel for the Plaintiff, Clear Channel Outdoor, Inc.

As detailed in the Affidavits of Mssrs. Zinser and Plosa (attached hereto as Exhibits A and B. respectively) each is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice. There are no disciplinary proceedings pending against either of them as a member of the bar in any jurisdiction, and they are familiar with the local rules of the United States District Court for the District of Massachusetts.

Payment of the \$50.00 admission fee each has been submitted to the Clerk of the Court. I have previously entered my appearance as counsel for the Plaintiff, Clear Channel Outdoor, Inc.

WHEREFORE, George A. Berman hereby respectfully requests that the Court grant this Motion for Leave to Admit L. Michael Zinser and Glenn E. Plosa *pro hac vice*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George A. Berman", with a stylized flourish at the end.

George A. Berman, Esq., BBO No. 040200  
Marjunette deMagistris, Esq., BBO No. 648133  
Peabody & Arnold LLP  
30 Rowes Wharf  
Boston, MA 02110  
(617) 951-2100  
(617) 951-2125

Dated: March 14, 2005

**CERTIFICATE OF SERVICE**

I, Marjunette deMagistris, hereby certify that on this 14th day of March, 2005, I caused the foregoing Motion to Admit L. Michael Zinser and Glenn E. Plosa *Pro Hac Vice* to be served by first class mail, postage prepaid on:

John Conti, Esq.  
FEINBERG, CAMPBELL & ZACK, P.C.  
177 Milk Street  
Boston, MA 02109

  
Marjunette deMagistris